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Application GRANTED. SO ORDERED.

Dated: June 28, 2021

June 27, 2021

Via ECF

Attn: Hon. Stewart D. Aaron, U.S. Magistrate Judge
United States District Court, Southern District of New York
500 Pearl Street, Room 1970
New York, NY 10007

Re: 1:20-cv-08247 Qubreli and Haxhani v. Elsayed III Corp. et al
LETTER MOTION TO EXTEND CHEEKS DEADLINE

Dear Judge Aaron:

The undersigned represents the plaintiffs Gentrit Qubreli and Kastriot Haxhani in the above-captioned matter. This *letter motion* seeks to extend the deadline for Plaintiff to file its *Cheeks* fairness settlement documents with the Court is submitted on consent of defendants.

At the outset, I apologize for the delayed submission of this motion, but, in short, Plaintiffs only received the draft settlement agreement early last week and finalized same on Thursday with the hope of obtaining a fully executed settlement agreement on Friday evening (the deadline date); however, defense counsel was in all day mediation and was unable to secure the fully executed document by the end of the day and had requested that I file this motion to extend the time to submit the *Cheeks* package by one week. I was also working on meeting a midnight deadline and forgot to timely file this motion with the Court.

In short, due to some of the defendants residing in New York while another resides abroad, all parties could benefit from the extra week to secure the signatures and make the submission.

For the foregoing reason I respectfully ask this Court to extend the present *Cheeks* submission deadline from June 25, 2021 to July 5, 2021. This is a first request for the relief sought.

Dated: Brooklyn, New York
June 27, 2021

Respectfully Submitted,

TURTURRO LAW, P.C.

By: /s/Natraj S. Bhushan, Esq

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To (via ECF): Joseph Harris, Esq., attorneys for defendants